

# **Attachment I**

# Guidance on drafting a Marine Cage Fish Farm Licence

Version 5 Sep 2016

# Contents of this guidance

1.	Introduction	2
2.	Imposition of conditions	2
	Format	
SCH	IEDULE 1 : CONTROLLED ACTIVITIES	3
	1 Controlled Activities Description	
	2 Controlled Activities Locations	
	IEDULE 2 : GENERAL CONDITIONS	
2.		
2.2		
2.3		
2.4	, ,	
2.5		
	IEDULE 3 : DESCRIPTION OF PREMISES	
3.		
3.2		7 4
	edule 4: Control of the Discharge of Solid Waste Matter and Polluting Matter	
and	Effluent into Controlled Waters	5
4.		
4.2		
4.3		
4.4		0
	scharge	5
4.5	<b>o</b>	
4.6		
	edule 5 : Sampling and Analysis	
5.	· ·	
5.2		
	edule 6 : records and provision of information	
6.		
6.2		
6.3		
	endix 1	<i>1</i>
		• • • •
	hen filling in column 2 of the table, there may be several trade products license r the same active ingredient. In such a case each product name should be	∌u
	ted	. 8
	pecifying Conditions in Column 4 of Table 2	
	, ,	
	2 Permitted Substances Working Planondition A1.1	
	ondition A1.2	
	ondition A1.3	
	ondition A1.4	
	ondition A1.5	
	ondition A1.6	
	ondition A1.7	
	ondition A1.8	12
	opendix 2 Protocol On The Calculation Of The Maximum Permitted	4.0
Qι	uantities In Repeated Treatments Of Emamectin Benzoate	.12

# 1. Introduction

The aim of this document is to provide guidance on drafting a site specific licence for a Marine Cage Fish Farm using the standard licence template WAT-TEMP-27 available through QPulse. Any problems or suggestions for improving the document should be emailed to the SEPA Aquaculture Specialist mailbox aquaculture@sepa.org.uk for updating as necessary. It is therefore important that copies are not kept separately which could allow differences in format to develop between offices.

This document also provides the justification for the template conditions which have been agreed by the Aquaculture Project Management Group (APMG) and provides a consistent approach to fish farm licensing. However, as each licence is site specific, it will always be necessary to customise the template conditions. This may involve the removal of sets of conditions or the addition of new conditions. It is essential that all such changes to the template are audit-trailed using the appropriate documentation. This should be included as part of the final documentation required as part of the determination of the licence.

Any significant changes from the fish farm template should be forwarded to APMG for information.

# 2. Imposition of conditions

The template conditions should be applied to all new fish farm applications or reviews of licences for existing sites. However, the extent to which it will be reasonable to apply the template conditions to existing farms will vary between sites. At existing farms, where it is not reasonable to apply certain template conditions immediately, then a timetable for their inclusion should be defined following discussions with the operator and included in the licence.

# 3. Format

To assist the rapid customising, much of the variable information is identified as highlighted fields.

The template also contains a list of contents. This can be up-dated easily once a licence has been customised by clicking once within the list (it will turn grey), then clicking right mouse button and choose up-date field. Then choose "up-date entire table" and click OK. This will remove all reference to deleted conditions but if any non- standard conditions have been added they must be given a title which must be labelled as a "heading 2" before you carry out the up-date. If in doubt, ask your admin officer for help.

# **SCHEDULE 1: CONTROLLED ACTIVITIES**

# 1.1 Controlled Activities Description

This identifies the primary activity category based on the levels of authorisation as defined in the CAR Practical Guide.

#### 1.2 Controlled Activities Locations

The licence should identify the location of the farm by reference to the National Grid References of the four corners of the cage grid, a written description and a plan provided as part of the application. This information can then be used to check cage locations during inspections. The NGRs and description are inserted into Table 1. The NGRs of the cage group corners can be found in the Marine Summary Sheet. The plan is copied into the licence in Appendix 3 and may identify the area covered by the lease provided by the Crown Estate Commissioners but shall show the cage layout within it. Such plans are included in the AutoDEPOMOD modelling reports submitted as part of the application. See the folder holding application and Mar Sum data, the EnvData/EIA folder should contain maps/charts at: \\sepanet\sepadata\DINGLocal\Data\FFData\FinFish

There may be an option to define the location of two or more sites which would be occupied in rotation allowing the fallowing of each site following one or two growth cycles, details of alternate locations can be included in the Table in Condition 1.2 and in the Plan in Appendix 3. The output from the AutoDEPOMOD modelling package is dependant, amongst other factors, upon the layout of the cages and the stocking density. It is critical therefore that the operator maintains the same cage layout to that set out in the application. During the early stages of the growth cycle, a lesser number of cages may be used with no environmental consequences however, as the full biomass is reached, it is important that the same cage arrangement to that described in the application and used to run modelling simulations is adopted by the operator. Consideration should be given to the fact that if the cage layout varies from that detailed in the appendix; a variation will be required to amend that plan in the licence.

# **SCHEDULE 2: GENERAL CONDITIONS**

#### 2.1 Responsible Person

This states that the responsible person identified in the application is responsible for licence compliance.

# 2.2 Records

Requires that the licence is held on site and available to staff and the records are maintained and legible. Details of specific records to be maintained are contained in Schedule 6.

### 2.3 Reporting

Requires copies of the records to be sent to SEPA in an agreed format at the frequency specified in Schedule 6. The second part of the condition requires that SEPA is notified if no reports are to be submitted due to the activity not being carried out during a given period.

#### 2.4 Incidents

Requires notification of any incidents. The second condition requires a written report of an incident if considered necessary.

#### 2.5 Environmental Harm

If the conditions of a licence are complied with, the document will represent a statutory defence against the offence provisions of CAR. The purpose of this condition is to allow enforcement action to be taken (even if all other licence conditions are complied with) against discharges that cause pollution or have a significant adverse impact on the water environment.

# SCHEDULE 3: DESCRIPTION OF PREMISES

# 3.1 Restriction on departure from application and supporting information

This prevents the discharger from deviating from the details of either the application or provisions imposed by the licence and may be used to back up a request for a new application where changes are proposed.

# 3.2 Maximum weight of fish

This is the primary condition which limits the scale of the discharge.

In addition, SEPA's CAR charging scheme requires the definition of the maximum biomass or weight of fish which can be held at a site. The proposed biomass limit for the site is supplied as an output in the modelling reports submitted by the applicant. This proposal is audited and may be amended by Marine Science staff. A recommendation as to the suitable biomass for this site will be supplied by Marine Science in the Marine Summary Sheet (Marine\_sum.xls). This limit should be inserted into the blank field within this condition on the template.

The second condition in this section relates to the stocking density of the fish held at the site. Variations in the density, expressed as kg of fish per cubic metre of water can significantly change the impacts observed upon the seabed at the cage fish farm site and therefore the presence of a condition limiting density is seen as an important means of protecting the environment. Stocking density refers to the density of fish (kg fish per cubic meter of water) in stocked cages, not including the volume of any empty cages held on the fish farm site. The Marine Summary Sheet as well as specifying a biomass, specifies a stocking density and the value set out in the sheet should be inserted into the blank field in this condition. Note that any reference to the "weight of fish" refers to the weight of fish in the cages including their stomach contents and body fluids. This shall not be after any period of starvation, and prior to slaughter.

# Schedule 4: Control of the Discharge of Solid Waste Matter and Polluting Matter and Effluent into Controlled Waters

# 4.1 Type of discharge and fish species to be cultured

This specifies that the discharge is trade effluent and solid waste matter from the culture of fish. The character of the discharge will vary according to species cultured. The default condition now allows the site to be used for the culture of Atlantic Salmon, Cod, Haddock, Halibut or Other and should be customised accordingly. A change to the species will inevitably involve a change to the operation of the site and will depart from the details submitted with the original application. It can therefore be dealt with by a review of licence provided the environmental implications are minor or alternatively by a new application. Mixed species sites are not ideal from a fish diseases perspective and further guidance may be available from the Fish Health Inspectorate, part of Marine Scotland. Licensing such sites will also lead to complications with regard to the limits for in-feed sea lice treatments. because the metabolism and release of in-feed treatments may vary from species to species and thus should a licence for such a site be granted then only bath treatments should be available for the treatment of fish other than Atlantic Salmon. (If in doubt on this issue, seek advice from an Aquaculture Specialist).

# 4.2 Feeding method

It is in the discharger's and SEPA's interest to minimise the loss of food to the environment.

# 4.3 Limitation on discharge period to allow fallowing

SEPA wishes to promote fallowing at all sites in order to break the cycle of sea lice infestation and allow the recovery of the sea bed in some circumstances. Reducing the risks of sea lice infestation should minimise the need for repetitive use of chemical therapeutants. A minimum fallow period of 42 days should be included in the licence as this is considered to be the minimum time required to prevent sea louse re-infestation. For accuracy and consistency across months of varying length this value should be entered in number of days in a 24 month period.

# 4.4 Requirement to notify SEPA of commencement and cessation of the discharge

This provides the necessary notification for SEPA staff to place the site on the CAR monitoring programme and trigger CLAS to invoice the operator in accordance with the CAR charging scheme. It also allows SEPA to ensure that any fallowing requirement set out in Condition 4.3 is complied with. Condition 4.1 may allow for different species of fish to be farmed and so the notification should include the species of fish from which the discharge will arise. This is so that an assessment can be made as to whether other conditions of the licence could potentially be breached or require a variation due to the change in species of fish. Specifically some fish species have longer growing cycles than the usual 24 month cycle for salmon.

# 4.5 Limitation on the discharge of medicines and chemicals

This condition together with the associated Appendix defines the constraints on the use of chemical therapeutants. It prohibits discharge of any other chemical therapeutant unless in accordance with the conditions in the Appendix or in accordance with a licence to discharge from a vessel. Fish farm operators may

choose to treat their fish within specially designed well boats, the discharges from such boats are authorised by Marine Scotland under the Marine (Scotland) Act 2010.

#### 4.6 Treatment Method

This condition in conjunction with the specific conditions relating to each medicine will aid in the reduction of the quantities of chemicals discharged to the environment.

# Schedule 5: Sampling and Analysis

# 5.1 Requirement to carry out monitoring

This requires the responsible person to carry out a monitoring programme as specified in the Monitoring Protocol Specification (MPS) supplied by SEPA and to inform SEPA when the monitoring will be carried out, allowing SEPA staff to be present if required.

# 5.2 Modification of the Monitoring Protocol

This permits SEPA to vary the self-monitoring programme to take account of the results of previous monitoring and could result in an increase or decrease in the programme content or frequency. The protocol may be modified in conjunction with a variation of the licence, achieved through discussion and written agreement with the operator. Where there is a failure to agree a revised protocol, the operator should be made aware that a lack of the required monitoring data may hamper forthcoming decisions should there be a proposal to expand operations at the site.

# Schedule 6: records and provision of information

#### 6.1 Maintenance of records

Requires that the responsible person keeps appropriate records, as follows:

#### Condition 6.1.1.1 location

Allows compliance with condition 1.2, 3.1 and Appendix 3 to be assessed.

#### Condition 6.1.1.2 biomass

Allows compliance with condition 3.2 to be assessed.

#### Condition 6.1.1.3 production

Allows a check to be made to assess food conversion ratio and biomass figures.

#### Condition 6.1.1.4 food use and conversion ratio

Provides records of food input and its efficiency of use. Also allows the calculation of the N, P and carbon input.

### Condition 6.1.1.5 record of N & P content of food

Allows manufacturer's data on food content to be available for inspection or reports as necessary. Also allows the calculation of the N, P and carbon input.

#### Condition 6.1.1.6 chemical therapeutants

Allows compliance with the relevant conditions in Appendix 1 and the associated Permitted Substances Working Plan to be assessed. Provides information on trends in therapeutant use. (See also Condition A1.7 (v) for details on Slice treatment limits and pre-approvals).

### Condition 6.1.1.7 net cleaning and anti-foulants

This condition provides information on the release of Priority (Hazardous) Substances classified under The Water Framework Directive and will be used in subsequent reviews in the light of policy decisions following the outcome of research on the effects of anti-foulant coatings used in aquaculture. The compounds used therefore may not necessarily be authorised as an approved biocide in the UK by the HSE (see http://www.hse.gov.uk/biocides/eu-bpr/authorised-approved-biocides.htm).

# **Condition 6.1.1.8 monitoring reports**

Requires the self-monitoring data to be available for inspection and to be sent to SEPA when required by condition 6.3.2.

# 6.2 Availability of records

Requires that records are available for inspection.

# 6.3 Provision of records to SEPA

Requires copies of the records to be sent to SEPA when specified. SEPA operates a database requiring records to be collected monthly and reported to SEPA on a quarterly basis. This information is important as it allows SEPA to fulfil reporting requirements under European Directives. The second part of the condition specifies a time limit for the submission of monitoring data to reduce the delay between sampling and reporting.

# Appendix 1

Appendix 1 and the associated Permitted Substances Working Plan (PSWP) are where staff must list the chemicals permitted for use on site together with reference to a series of conditions to be allocated to each chemical specified.

When controlling the use of any particular chemical, it is imperative, where applicable, to specify only product names which are authorised by the VMD otherwise inappropriate formulations may be used by less scrupulous operators. Further details of medicines approved by the VMD for use in aquaculture can be found at <a href="https://www.gov.uk/government/organisations/veterinary-medicines-directorate">https://www.gov.uk/government/organisations/veterinary-medicines-directorate</a>.

#### 7.1 Medicines and Chemicals

#### Table 2

Table 2 must be used to specify medicines which may be used at the site and should include all substances not included in the Permitted Substances Working Plan. In general Table 2 should be used to define conditions relating to the use of higher risk substances such as sea lice medicines, which are limited by numeric conditions and require pre-notification or pre-approval. Table 2 can also be used to permit the discharge of other substances not included in the Permitted Substances Working Plan. For each substance included in Table 2 an appropriate condition should be selected from the list of conditions, guidance on which conditions should be selected are set out below. Normally, only those conditions required should be listed in the appendix.

When filling in column 2 of the table, there may be several trade products licensed for the same active ingredient. In such a case each product name should be listed.

# Specifying Conditions in Column 4 of Table 2

Although site specific conditions may dictate otherwise, in general we should strive to be consistent in the choice of conditions we specify in column 4. It is essential to specify one of either condition A1.2, A1.3 or A1.4 for each medicine or chemical. The condition chosen to apply to each substance will reflect the degree of perceived risk in each case.

# 7.2 Permitted Substances Working Plan

Each licence issued for a marine cage fish farm includes a Permitted Substance Working Plan (PSWP). The PSWP sets out a range of substances that may be used at the site in addition to the chemicals set out in Table 2 of Appendix 1. The substances included in the PSWP are those whose use will pose a lower risk to the water environment including anaesthetics, antibiotics and disinfectants. The standard PSWP template includes a wide range of the conventional substances used by fish farmers and limits their use to that set out in the manufacturer's instructions. Additional substances may be added to the PSWP but only where there is a low risk of harm to the water environment from the inclusion of the substance; advice should be sought from an Aquaculture Specialist as required.

#### Condition A1.1

This condition should be included for all bath treatments to ensure that no treatment chemicals are discharged without having been applied within a fully contained enclosure. Treatment without full enclosure of the cage for example through the use of a "skirt" would normally result in the use of larger quantities of chemical being used to achieve a working concentration compensating for the higher treatment volume and dilution due to water exchange through the opening. Best practice in the use of bath treatments minimises the quantity of chemical therapeutant discharged to the marine environment. The aim should be to ensure that the treated volume is reduced to at least 50% of the cage volume and up to about 30 % where possible. However, physical constraints and some cage designs may prevent this scale of reduction being achieved and the actual %age reduction figure should be calculated from the shallowed treatment depth specified in the application or as agreed with the discharger.

#### Condition A1.2

This condition should be used for substances where pre-notification is not necessary. This should apply to lower risk substance such as any anaesthetics, and most anti-microbials where these are not included in the PSWP (if in doubt seek advice).

#### Condition A1.3

This condition should normally apply to Excis and Alphamax; and for Salmosan at farms well separated from neighbouring farms where there is no risk of a release of Salmosan coinciding with a plume from another site. Pre-notification provides SEPA staff with an opportunity to attend and inspect a treatment to check licence compliance.

#### **Condition A1.4**

This condition should be used for Slice. The pre-notification details of the proposed treatment, date, time, amount of medicine to be used shall be entered into the Slice Retreatment Calculator (SRC) maintained by SEPA and used to inform SEPA whether permission to use Slice is acceptable. Permission will be withheld where residue levels are already exceeding EQS, including reference station exceedences. See Marine Cage Fish Farm CAR licence review guidance doc, flowchart 3. Enforcement action should be taken if slice residue at AZE >2 times EQS where EQS is 0.763µg/kg.

This condition should also be chosen for **Salmosan** where 2 or more sites are in close proximity and there is a need to control releases to prevent plumes coinciding. Bear in mind that inclusion of this clause involves SEPA in a significant amount of administration, as each farm treatment must be approved in writing taking into account whether a neighbouring site has had recent approval to use a chemical. Use this condition for Salmosan only where there is considered to be a significant risk of coincidental plumes combining.

It is hoped that, either by management agreement or as part of a strategic sea lice control plan, treatments will be organised with farm operators by a co-ordinator nominated by the relevant association who will be aware of the terms of the licences within his area. Our approval can be simplified to sending a standard letter or email message upon receipt of an agreed plan for the loch / voe.

In addition, if the operator has applied to include **Panacur** in their licence then it should be included in Table 1 as an anti-parasitic and cross referenced with A1.4 pre-notification requirements. Panacur is an in-feed gastro-intestinal worming treatment, active ingredient fenbendazole used to treat Eubothrium. Its use is normally a one-off and if Panacur is not already included in the licence then should be applied for as a variation. Although SEPA do not apply a licence limit on fenbendazole use, the operator is required to pre-notify, record and report all treatments in accordance with Schedule 6.

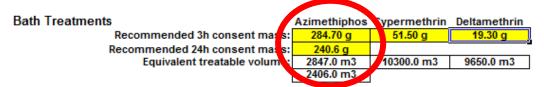
This clause will not normally be necessary for Excis as it is removed fairly rapidly from solution.

#### Condition A1.5

This condition applies only to Salmosan, Salmosan Vet or Azasure and requires information from:

- a) the 3-hour model for the first two entries (unless the 72-hour model output requires a more restrictive regime); and
- b) the 72-hour model for the third (this assumes that the whole farm will be treated and provides a maximum amount of azamethiphos to be released in 24 hrs).

These values will be supplied by the applicant and validated by Marine Science staff as shown below:



As a starting point, the output from the 3-hour model is used as the first regime fed into the 72-hour model. If this regime passes the EQS and acceptable area of impact tests, the first time period can be set at 3 hours with the first amount of azamethiphos set as specified by the output from the 3 hour model. The 4th entry is then based on the 72-hr model output converted to a daily rate (this makes checking compliance on site an easier task).

Where the 72-hour model predicts this regime will breach the criteria, the quantity of azamethiphos must be reduced to meet the requirements of the 72-hour model (obtained by repetition of the 72-hour model using progressively smaller cage volumes until the criteria can be met), the first time period should then be extended to 24 hours to restrict the rate of treatment releases and the second sentence of condition A1.5 should be deleted, i.e. where the 24h amount is less than the 3h amount, only use the 24h condition and amount. Where the amount permitted is not sufficient to carry out a treatment of even 1 cage in 24 hours allowing for a reduction to 8% of the total cage volume (as may be the case with very large cages) then Salmosan cannot be safely used at the site in question and it should be removed from the table, thus prohibiting its use.

This approach is adopted to provide sufficient restriction in achieving a controlled rate of release throughout a treatment to safeguard the EQS but to seek to minimise our imposition of a specific and impractical treatment regime on the operators and, in addition, not to licence an amount that is of no practical use to them.

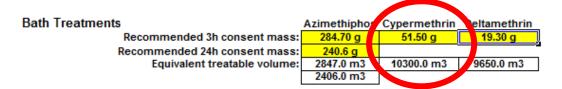
The template specifies the amount of azamethiphos in grams. The equivalent quantity as Salmosan is also now included. As this is a 50% Wt/Wt powder preparation, simply multiply the modelled azamethiphos amount by 2 to obtain this.

#### **Condition A1.6**

Applies only to Excis and requires information from the 6-hour model. These values will be supplied by the applicant and validated by Marine Science staff.

A requirement of this condition is that simultaneous or near simultaneous use of Excis and AMX products is not permitted. This is because the similarity in chemical structure and mode of action could mean that their effects would be additive were they present in a waterbody at the same time. This would pose an unacceptable risk of impacts upon the environment. Hence the conditions relating to both treatments

restrict the use of the treatment where the alternative has been discharged within the previous 3 hours by either bath treatment or from a well boat.



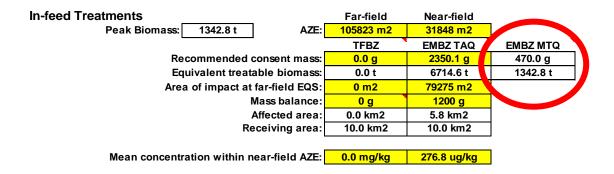
The template specifies the amount of cypermethrin in grams. The equivalent quantity as Excis is also now included. As this is a 1% solution of cypermethrin, simply multiply the modelled cypermethrin amount by 100 to obtain the quantity in millilitres.

#### **Condition A1.7**

Applies only to Slice or Quinafish. If not relevant, this condition should be deleted from the appendix (and the conditions following it should be re-numbered accordingly, again remembering to correct your entries in column 4 of Table 2).

You must customise condition (iii) by adding the maximum treatment quantity (MTQ) figure supplied by the applicant and validated by Marine Science staff following the results of running the AutoDEPOMOD model for the site in question. Re-treatment quantities are dictated by calculations described in Appendix 2 at the end of the licence.

The template specifies the amount of emamectin benzoate in grams. The equivalent quantity as the veterinary medicine "Slice Premix" is also now included. As this is a formulation containing 0.2% w/w emamectin benzoate, simply multiply the modelled emamectin benzoate amount by 500 to obtain this.



Condition 1.7 (v) now includes a limit on the amount of Slice which can be prescribed and dispensed by veterinary surgeon discretion over and above the maximum allowable re-treatment quantity (MARQ). This limit is set at 20% of the MARQ. As before, proposals to administer a Slice treatment must be notified to SEPA at least 2 full working days beforehand however SEPA must now grant approval for any exceedances of the MARQ. This responsibility for granting approval lies with the local Ops team. Notification of the intention to treat with Slice should include date, quantity, period of use and no. cages (as per condition 6.1.1.6). For each notification to use Slice the SRC should be updated by local Ops prior to granting approval. If the SRC shows that the TAQ will be exceeded then approval to treat with Slice should be refused.

#### Condition A1.8

Applies only to AMX and requires information from the 6-hour model. These values will be supplied by the applicant and validated by Marine Science staff. The licence values for AMX can be derived from Excis values by multiplying the Excis values by 0.375. Thus where the licence may impose a limit of 100g on the use and discharge of cypermethrin, a limit of 37.5g should be imposed on the use of deltamethrin. The conditions relating to AMX are almost identical to those for Excis, as shown below:

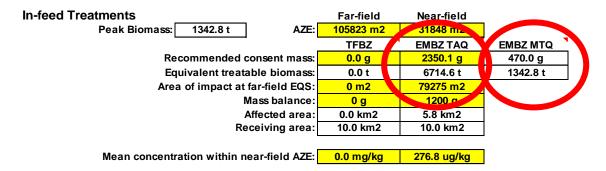
A requirement of this condition is that simultaneous or near simultaneous use of Excis and AMX products is not permitted. This is because the similarity in chemical structure and mode of action could mean that their effects would be additive were they present in a waterbody at the same time. This would pose an unacceptable risk of impacts upon the environment. Hence the conditions relating to both treatments restrict the use of the treatment where the alternative has been discharged within the previous 3 hours by either bath treatment or a well boat.

Bath Treatments	Azimethiphos	Cypermethrin	Deltamethrin
Recommended 3h consent mass:	284.70 g	51.50 g	19.30 g
Recommended 24h consent mass:	240.6 g		
Equivalent treatable volume:	2847.0 m3	10300.0 m3	9650.0 m3
	2406.0 m3		

The template specifies the amount of deltamethrin in grams. The equivalent quantity as AMX is included. As this is a 1% solution of deltamethrin, simply multiply the modelled deltamethrin amount by 100 to obtain the quantity in millilitres.

# Appendix 2 Protocol On The Calculation Of The Maximum Permitted Quantities In Repeated Treatments Of Emamectin Benzoate.

This appendix is self-explanatory to a large extent. Its inclusion accompanies condition A1.7. The values and information required for completion of this appendix will be supplied by the applicant and validated by Marine Science staff. This will allow the relevant Ops officer to draft the licence conditions [see A1.7] and customise the appendix text [TAQ and MTQ].



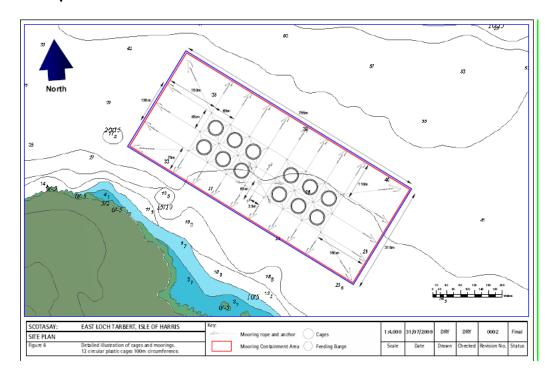
The extension paper retreat calculation (Slice) tables are no longer included in the fish farm licence template. These are replaced by the Slice Retreatment Calculator, reference CAR/L/ /SRC, will be issued to the applicant on a disc with the determined licence or licence variation. Marine Science will provide Ops with an electronic version of the SRC and local admin should copy these to disc. This replaces the requirement to copy the previous PRN file to disc.

For variations, the SRC should be populated by Ops with Slice treatment data for the previous 4.5 years if data is available.

# Appendix 3 Controlled Activities Location Plan

The plan is copied into the licence in Appendix 3 and may identify the area covered by the lease provided by the Crown Estate Commissioners or other relevant authorities but shall show the cage layout within it. Such plans are routinely included in the AutoDEPOMOD modelling reports submitted as part of the application materials (see 1.2 above). This plan can be used by staff inspecting farms to ensure compliance with the licence. An example as shown below is included in the MCFF licence template. The first grid reference used should be top left, following round clockwise.

### Example Plan Reference: CAR/L/1234567



Cages shall be positioned within an area bounded by a line drawn from NG 1804 9797 to NG 1837 9768; then to NG 1838 9756; then to NG 1802 9781; and then to NG 1804 9797.

Cage configuration shall consist of 12 x 100 m circumference circular cages with 12m deep nets. The cages shall be configured in 2 groups each of 6 cages (3 x 3) with a 65m gap between the two groups.

Cages shall be positioned within an area bounded by a line drawn from [Enter 10-digit NGR 1] to [Enter 10-digit NGR 2]; then to [Enter 10-digit NGR 3]; then to [Enter 10-digit NGR 4]; and then to [Enter 10-digit NGR 1]. Cage configuration shall consist of [Enter cage size, eg. 12x100]m circumference circular cages with [Enter cage depth]m deep nets. The cages shall be configured in [Enter cage depth] groups each of [Enter cage depth] cages ([Enter cage layout eg. 3x3]) with a [Enter cage gap]m gap between the two groups.